

The Reback Group, LLP

Attorneys At Law

November 28, 2005

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Marlene H. Dortch
Secretary
Federal Communications Commission
445 12th Street SW
Washington, DC 20554

**Re: Compliance Letter of SunRocket, Inc.
WC Docket No. 05-196**

Dear Ms. Dortch:

Attached please find the required Compliance Letter for SunRocket, Inc. for WC Docket No. 05-196. Please refer any questions or correspondence regarding the report to me at the address below.

Sincerely,

/s/

Sanford C. Reback
Managing Partner
The Reback Group, LLP
sreback@rebackgroup.com

Compliance Letter
WC Docket No. 05-196
November 28, 2005
SunRocket, Inc.
Vienna, VA

SunRocket, Inc. ("SunRocket") submits this Compliance Letter pursuant to the requirements of the Federal Communications Commission's ("Commission" or "FCC") June 3, 2005 VoIP 911 Order, as further explained in the November 7, 2005 Public Notice issued by the Commission's Enforcement Bureau.

911 Solution

Since its inception, SunRocket has placed a high priority on providing its subscribers with emergency 911 dialing services. Through arrangements with several third-party suppliers, SunRocket currently provides E911 service using Selective Routers and the other appropriate elements of the Wireline E911 Network to approximately 96% of its current subscribers. This service transmits all 911 calls as well as the appropriate callback number and the caller's Registered Location to the appropriate emergency answering point. E911 is a standard component of SunRocket's VoIP service offerings, included for subscribers at no additional charge. SunRocket estimates that it indirectly interconnects to approximately 350 Selective Routers.

SunRocket does not currently provide all of its customers with E911 for several reasons. For a brief period after its establishment, SunRocket relied upon a third-party supplier in certain areas that proved unable to provide 911 services as the supplier had indicated to SunRocket. SunRocket is in the process of transferring as many of these customers as possible to full E911. More recently, one of the suppliers on whom SunRocket relied to provide E911 services ceased providing such services altogether. SunRocket is in the process of making arrangements with an alternative third party supplier to procure E911 services for these customers. SunRocket anticipates that this process will be completed by year-end, at which time it estimates that the percentage of its subscribers receiving E911 will be nearly 99%.

SunRocket also has a small percentage of subscribers, which it estimates at less than 1%, to whom it is currently not providing E911 service because the subscribers improperly chose phone numbers outside their normal geographic area during the customer sign-up process. When SunRocket becomes aware of such instances, it takes steps where possible to assign such subscribers new numbers capable of receiving full E911. By the end of the year, SunRocket plans to institute additional procedures during the subscriber acceptance process that it believes will reduce the number of such incidents.

SunRocket stopped offering service or accepting new subscribers in those areas in which it was unable to provide E911 service through its third party providers in May 2005. Because of the circumstances described above, those SunRocket customers who do not currently have E911 are geographically dispersed

throughout many MSAs. While SunRocket is taking commercially reasonable steps to provide E911 service to these “legacy” customers as quickly as possible, SunRocket believes that it may not be able to provide E911 service to a very small percentage of its subscriber base – approximately 1% or so – in the near to mid term.

Obtaining Initial Registered Location Information

Prior to the initiation of service, SunRocket requires each potential subscriber to provide his/her Registered Location information, the physical location at which the subscriber will utilize the service. SunRocket has maintained this policy since it began providing service, and thus has acquired the initial Registered Location information from 100% of its subscribers as reported by the subscribers.

Obtaining Updated Registered Location Information

SunRocket allows subscribers to update their Registered Location information by calling SunRocket customer service. Subscribers may contact customer service using the same CPE they use to access SunRocket VoIP service.

Technical Solution for Nomadic Subscribers

SunRocket is currently in discussions with third-party suppliers regarding the deployment of a possible solution for nomadic subscribers. SunRocket has not deployed the so-called automatic detection mechanism, mentioned in the Commission’s November 7, 2005 Public Notice and described in greater detail in the submissions of certain commenters in this docket, and has no plans to do so at this time. Although the automatic detection procedure may allow for true nomadic E911 in a small percentage of cases, even the proponents of the system concede that most detected disconnections will not be associated with a customer location move, but rather with “false positives” – such as power outages, rebooting the TA to clear trouble, moving the TA between locations within a home, ISP connectivity outages or planned maintenance, or even a VoIP provider’s server maintenance or service outage.

As described, moreover, the system would block or intercept all calls, except 911 calls, in all of the above circumstances. Thus, critically important non-911 calls – such as those to poison control, a doctor’s office, a police emergency number, or a neighbor – would at a minimum be delayed, with potentially disastrous results, while the subscriber was queried regarding whether his/her Registered Location had changed. In the overwhelming majority of cases, the answer will be “No.” SunRocket questions whether such a system in fact enhances public safety.

As stated above, SunRocket stopped accepting new subscribers in areas in which it could not offer E911 service in May 2005.